

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re WIRECARD AG SECURITIES LITIGATION)	Civ. Action No. 2:20-cv-03326-AB
)	
)	<u>CLASS ACTION</u>
)	
This Document Relates To:)	STIPULATION AND [PROPOSED] ORDER
)	
ALL ACTIONS)	
)	

WHEREAS on June 7, 2020, Lead Plaintiffs filed a Declaration of Shawn A. Williams in Support of Lead Plaintiffs’ Supplemental Memorandum in Support of Personal Jurisdiction (ECF No. 100-1) (the “Declaration”) and an accompanying Motion to Seal (ECF No. 101) (the “Original Motion to Seal”);

WHEREAS the Declaration and Original Motion to Seal included descriptions of Exhibits 18 and 19 thereto that contained the names of two European Union citizens, ECF No. 100-1, at 2; ECF No. 101, at 2;

WHEREAS on June 20, 2023, Defendant Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft (“EY Germany”) filed a Response to the Original Motion to Seal (the “Response”) (ECF No. 108), (1) explaining that the European Union’s General Data Protection Regulation (“GDPR”) restricts the disclosure of documents containing “any information relating to an identified or identifiable natural person . . . in particular by reference to an identifier such as a name,”” *id.* at 2 (quoting Art. 4 GDPR § 1), and (2) requesting that the names of these two individuals be redacted, ECF No. 108, at 5 n.2;

WHEREAS on August 1, 2023, the Court granted the Original Motion to Seal to the extent described in the Response and directed the parties to file versions of the documents listed in the Response that were redacted in accordance with the Court's Order, ECF No. 114, at 1–2;

WHEREAS on September 1, 2023, Lead Plaintiffs filed a version of the Original Motion to Seal that was redacted in accordance with the August 1, 2023 Order (ECF No. 116) (the “Redacted Motion to Seal”); and

WHEREAS on September 1, 2023, EY Germany filed versions of the Declaration and the Original Motion to Seal that were redacted in accordance with the August 1, 2023 Order (ECF Nos. 117-29, 117-30);

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned, pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule of Civil Procedure 7.4, subject to the Court’s approval, that:

- The parties respectfully request that the Court seal the Declaration currently on the docket at ECF No. 100-1. A version redacted in accordance with the Court’s August 1, 2023 Order will remain on the public docket at ECF No. 117-29.
- The parties respectfully request that the Court seal the Original Motion to Seal currently on the docket at ECF No. 101. A version redacted in accordance with Court’s August 1, 2023 Order will remain on the public docket at ECF No. 116.
- The Redacted Motion to Seal, ECF No. 116, may be terminated as moot.

Dated: December 8, 2023

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* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ANITA B. BRODY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Craig D. Singer, hereby certify that on this 8th day of December 2023, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. The foregoing is available for viewing and downloading from the CM/ECF system, which will also send email notification of such filing to all attorneys of record in this action.

/s/ Craig D. Singer